

A-SW-001792

Response to DOE/HAZWRAP Comments

1. An introductory statement shall be added at the beginning of the Ecology SOPs Volume V. It will briefly identify that the SOPs are not a stand alone document but are supported by many other Environmental Restoration documents such as the other ER SOPs, other SOP Addenda, ER QAPjPs, and project specific QAPjP Addenda, Site Health and Safety Plans, and OU RI Workplans. The introduction will also briefly discuss how these ecology procedures will be used towards collecting data for conducting Environmental Evaluations of RCRA/CERCLA sites at Rocky Flats, and other routine biological investigations to assess the potential impacts from contamination at the Plant. It will be mentioned that Rocky Flats is a DOE Weapons facility and all work at the site must abide by specific security requirements. Furthermore, a statement shall address the appropriate procedures for modifying and / or amending the Ecology SOPs.
2. See above reference to the Site Health and Safety Plan.
3. See above reference to security requirements.
4. Chain-of-Custody requirements for environmental samples are specified in SOP 1.13, Volume I, Field Operations. This SOP will be reviewed to determine if the concept of Cradle-to-Grave is clear in the Purpose and Scope section of that SOP.
5. Statistical concepts for Ecology sampling are addressed in the "Development of Ecology Field Sampling Plans" SOP. Draft form of this SOP will be available May 1, 1991. The RFEDS Database requirements pertain to the format in which the data are entered into the database. Data tracking requirements are specified in SOP 1.14, Volume I. Therefore, ecology data tracking shall adhere to SOP 1.14. Furthermore, an SOP has been developed which specifies ecology data coding.
6. Flow charts will be added to support the text where decision options have been discussed.
7. The personnel training requirements section of the Ecology SOPs has been changed to specify that at least one person on the field crew shall have a minimum of a Master's Degree in biology and two years experience with the appropriate sampling equipment. and that all field personnel implementing a specific SOP will have successfully completed SOP training on the appropriate equipment. EG&G feels it would not be advantageous to limit the sampling activities to Ph. D. personnel. This will greatly limit the work force available and increase project costs substantially.
8. A statement referring to periodic audits to observe and critique performance will be added to the requirements section. It will state that poor performance will be followed by re-training. This is an established ER protocol and needs to be mentioned.
9. Criteria for the selection of sampling sites is discussed in the "Development of Field Sampling Plans SOP now in Draft form. Also, additional information on identifying sampling sites specific to taxonomy is presented in each of the individual Taxonomic SOPs.

10. References noted in the SOPs shall be separated into actual "references" (used in the text) and "bibliography" for references not actually referenced but useful as information sources. Also, all references to the CSU Ecology Studies Methodologies document will be removed since it is not a published document.
11. A reference to the organizational chart found in the QAPjP will be made as part of the introductory section in the discussion of how the SOPs support Environmental Restoration activities at RFP. It identifies the RFI / RI structure within the Environmental Management Department (EM) as well as EMs position within the structure of Rocky Flats.
12. Field data forms are currently in revision. There now exists a "data tracking" form consistent for all ecology samples to meet the requirements of SOP 1.13. Also, there will be additional field forms only for compiling data needing further summary or assessment prior to actual input into RFEDS. Also, an SOP Appendix identifying species and habitat codes to be used in documenting biota data has been developed. This will allow for additions and / or revisions to the coding system without changing each individual SOP.